

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

BRIANNA BOE, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
and)	
)	
UNITED STATES OF AMERICA,)	Case No. 2:22-cv-184-LCB
Plaintiff-Intervenor,)	
)	
v.)	
)	
STEVE MARSHALL, <i>et al.</i>,)	
)	
Defendants.)	

**JOINDER TO RESPONDENTS’ MOTION TO ALTER OR AMEND
ORDER OR, IN THE ALTERNATIVE, OFFER OF PROOF**

COMES NOW Respondent Michael Shortnacy (“Shortnacy”), by and through his undersigned counsel, and respectfully joins, adopts, and incorporates as if fully set forth herein the Motion to Alter or Amend Order or, in the Alternative, Offer of Proof, which was filed by Respondents Melody H. Eagan and Jeffrey P. Doss (doc. 496). In its order of March 18, 2024, the Court denied the admission into evidence of Gregory P. Joseph’s expert testimony. Doc. 449 (denying Respondent Eagan’s, Doss’s, and Shortnacy’s motion to submit Joseph’s testimony). To the extent the Court permits the admission into evidence of such expert testimony, Shortnacy adopts and offers into evidence such expert testimony in response to the original

February 21, 2024 Order to Show Cause (doc. 406) and the May 1, 2024 Supplemental Order to Show Cause addressed to Shortnacy (doc. 480). To the extent the Court declines to alter or amend its March 18, 2024 order, Shortnacy joins in the Offer of Proof made by Respondents Eagan and Doss.

Respectfully submitted,

/s/ Bruce F. Rogers

Bruce F. Rogers

Elizabeth N. Terenzi

BAINBRIDGE, MIMS, ROGERS & SMITH, LLP

600 Luckie Drive, Suite 415

Birmingham, Alabama 35223

Telephone: (205) 879-1100

Facsimile: (205) 879-4300

Email: brogers@bainbridgemims.com
bterenzi@bainbridgemims.com

Counsel for Michael Shortnacy

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will give notice of such filing to all counsel of record.

/s/ Bruce F. Rogers _____

OF COUNSEL